

Steven J. Cohen (SC-1289)
Wachtel & Masry, LLP
110 East 59th Street
New York, NY 10022
(212) 909-9500
Attorneys for Defendant Beyond Electronics, Inc.
d/b/a Beyond Cell

MAY 08 2008

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RESEARCH IN MOTION LIMITED,

Plaintiff,

-against-

BEYOND CELL INTERNATIONAL, INC., JOHN
DOES 1-50, XYZ BUSINESS,

Defendants.

08 CV 03322 (TPG)

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

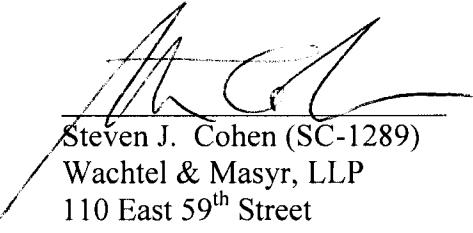
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern District of New York, I, Steven J. Cohen, a member in good standing of the bar of this Court, hereby move for an Order on behalf of defendant allowing the admission *pro hac vice* of:

Applicant's Name: THOMAS I. ROZSA
Firm Name: ROZSA LAW GROUP, LC
Address: 18757 Burbank Boulevard, Suite 220
City/State/Zip: Tarzana, California 91356-3346
Phone Number: (818) 783-0990
Fax Number: (818) 783-0992
Email Address: tom@rozsalaw.com

Thomas I. Rozsa is a member in good standing of the Bar of the State of California. There are no pending disciplinary proceedings against Thomas I. Rozsa in any State or Federal Court.

Dated: May 7, 2008
New York, New York

Respectfully submitted,



Steven J. Cohen (SC-1289)

Wachtel & Masyr, LLP
110 East 59th Street
New York, NY 10022
Tel. (212) 909-9500
Fax (212) 909-9463

To: Martin N. Mutterperl, Esq.
Fulbright & Jaworski, L.L.P.
666 Fifth Avenue
New York, New York 10103
Attorneys for Plaintiff

Thomas I. Rozsa, Esq.
Rozsa Law Group LC
18757 Burbank Boulevard, Suite 220
Tarzana, California 91356-3346

Steven J. Cohen (SC-1289)
Wachtel & Masyr, LLP
110 East 59th Street
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d/b/a Beyond Cell

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RESEARCH IN MOTION LIMITED,

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BEYOND CELL INTERNATIONAL, INC., JOHN
DOES 1-50, XYZ BUSINESS,

Defendants.

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**AFFIDAVIT OF STEVEN J.
COHEN IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

STEVEN J. COHEN, being duly sworn, hereby deposes and says as follows:

1. I am a member of Wachtel & Masyr LLP, counsel for defendant Beyond Electronics Inc., d/b/a Beyond Cell sued as "Beyond Cell International" (hereinafter "Beyond Cell"), in the above captioned action. I am familiar with the proceedings in this case. I make this affidavit based on my personal knowledge of the facts set forth herein and in support of Beyond Cell's motion to admit Thomas I. Rozsa as counsel *pro hac vice* to represent Beyond Cell in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on February 7, 1983. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Thomas I. Rozsa since 2005. A copy of the Certificate of Good Standing for Mr. Rozsa for the State Bar of California and United States District Court for the Central District of California is attached.

4. Mr. Rozsa is a member of the Rozsa Law Group LC, in Tarzana, California.

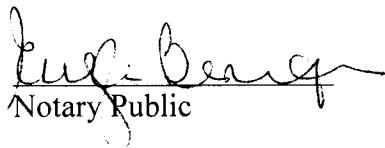
5. I have found Mr. Rozsa to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

WHEREFORE, Defendant respectfully requests that the Court grant Beyond Cell's motion and enter an Order granting the admission of Thomas I. Rozsa, *pro hac vice*, substantially in the form attached hereto as Exhibit A.



Steven J. Cohen (SJC-1289)

Sworn to me this 7th day
of May 2008



Eugenia Benetos
Notary Public

EUGENIA BENETOS
NOTARY PUBLIC - STATE OF NEW YORK
No. 01BE6130813
Qualified in Queens County
My Commission Expires July 25, 2009



**THE STATE BAR
OF CALIFORNIA**

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

MEMBER SERVICES CENTER

TELEPHONE: 888-800-3400

May 2, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, THOMAS IGOR ROZSA, #080615 was admitted to the practice of law in this state by the Supreme Court of California on June 23, 1978; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".
Kath Lambert
Custodian of Membership Records

United States District Court

Central District of California

CERTIFICATE OF GOOD STANDING

I, SHERRI R. CARTER, Clerk of this Court, certify that

Thomas I. Rozsa, Bar No. 80615

was duly admitted to practice in this Court on August 17, 1978

and is in good standing as a member of the Bar of this Court.

Dated at Los Angeles, California.

on May 1, 2008
DATE

SHERRI R. CARTER, CLERK

By


Lupe Thresher
Lupe Thresher, Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RESEARCH IN MOTION LIMITED,

Plaintiff,

-against-

BEYOND CELL INTERNATIONAL, INC., JOHN
DOES 1-50, XYZ BUSINESS,

Defendants.

08 CV 03322 (TPG)

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Steven J. Cohen, attorney for Defendant Beyond Cell International, Inc. and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that:

Applicant's Name:	THOMAS I. ROZSA
Firm Name:	ROZSA LAW GROUP, LC
Address:	18757 Burbank Boulevard, Suite 220
City/State/Zip:	Tarzana, California 91356-3346
Phone Number:	(818) 783-0990
Fax Number:	(818) 783-0992
Email Address:	<u>tom@rozsalaw.com</u>

is admitted to practice *pro hac vice* as counsel for Defendant Beyond Electronics, Inc. d/b/a Beyond Cell, sued as "Beyond Cell International" in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline for attorneys. Mr. Rozsa shall immediately apply for an ECF password at www.nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: May ___, 2008
New York, New York

U.S.D.J.

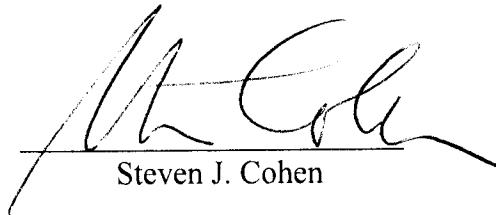
CERTIFICATE OF SERVICE

I, Steven J. Cohen, attorney for defendant Beyond Cell Electronics, Inc. d/b/a Beyond Cell, hereby certify that a true and correct copy of the attached Motion to Admit Counsel Pro Hac Vice was served by first class mail on May 7, 2008, upon the following parties:

Martin N. Mutterperl, Esq.
Fulbright & Jaworski, L.L.P.
666 Fifth Avenue
New York, New York 10103
Attorneys for Plaintiff

Thomas I. Rozsa, Esq.
Rozsa Law Group LC
18757 Burbank Boulevard, Suite 220
Tarzana, California 91356-3346

Dated: New York, New York
May 7, 2008



A handwritten signature in black ink, appearing to read "S. Cohen".

Steven J. Cohen